

United States District Court
Southern District of Texas

ENTERED

March 14, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

RONALD E. COGGINS, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

VS.

CAMBER ENERGY, INC., JAMES A.
DORIS, and FRANK W. BARKER, JR.,

Defendants.

§ CIVIL ACTION No. 4:21-cv-03574

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STIPULATION AND ORDER APPOINTING CO- LEAD PLAINTIFFS AND CO- LEAD COUNSEL

CLASS ACTION

JUDGE CHARLES ESKRIDGE

WHEREAS, on October 29, 2021, this action (the “Action”) was commenced by filing the complaint against the above-captioned Defendants, alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Camber Energy, Inc. (“Camber”) (Dkt. No. 1);

WHEREAS, as a putative class action alleging violations of the federal securities laws, the Action is governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), which provides, in relevant part, that any putative Class member who “either filed the complaint or made a motion” within sixty (60) days of publication of the notice of pendency of the Action—here, on or before December 28, 2021—may be considered by the Court for appointment as Lead Plaintiff (15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(aa));

WHEREAS, on December 28, 2021, six movants filed motions seeking appointment as Lead Plaintiff pursuant to the PSLRA: (i) George C. Smith, Jr. (“Smith”) (Dkt. No. 18); (ii) Robert Laurent and Ajmal Hussain (“Laurent and Hussain”) (Dkt. No. 24); (iii) Juma Salarzi (“Salarzi”) (Dkt. No. 19); (iv) Dr. Roderick A. Yamat (“Yamat”) (Dkt. No. 20); (v) Tariq Khan (“Khan”) (Dkt. No. 22); and (vi) and the Camber Investor Group (Dkt. No. 25);

WHEREAS, on January 18, 2022, Smith, Laurent and Hussain filed oppositions to the competing lead plaintiff motions (Dkt. Nos. 33 and 34);

WHEREAS, on January 14, 2022, Yamat filed a notice of non-opposition to the competing lead plaintiff motions (Dkt. No. 30), and on January 18, 2022, Salarzi, the Camber Investor Group, and Khan filed notices of non-oppositions to the competing lead

plaintiff motions (Dkt. Nos. 31, 32, and 35) leaving Smith, Laurent and Hussain as the only putative Class members seeking appointment as Lead Plaintiff;

WHEREAS, the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(iii), provides, *inter alia*, that the most adequate plaintiff to serve as Lead Plaintiff is, in the determination of the Court, the “person or group of persons” that has the largest financial interest in the relief sought by the class and otherwise satisfies the relevant requirements of Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”);

WHEREAS, 15 U.S.C. § 78u-4(a)(3)(B)(iv) provides that, subject to the approval of the Court, the most adequate plaintiff will select and retain counsel to represent the class;

WHEREAS, Smith, Laurent and Hussain have each provided sworn Certifications pursuant to the PSLRA in support of their respective applications for Lead Plaintiff appointment, setting forth, *inter alia*, their transactions in Camber securities, and each has alleged a significant and comparable financial interest in this litigation;

WHEREAS, having reviewed one another’s submissions to the Court, Smith, Laurent and Hussain believe that they each satisfy the requirements of Rule 23; and

WHEREAS, having reviewed one another’s submissions to the Court, Smith, Laurent and Hussain believe that it is in the best interests of the Class for Smith, Laurent and Hussain to serve as Co-Lead Plaintiffs and for their respective selections of The Rosen Law Firm, P.A. (“Rosen Law”) and Pomerantz LLP (“Pomerantz”) to serve as Co-Lead Counsel and Steckler Wayne Cochran Cherry PLLC (“SWCC”) to serve as Liaison Counsel for Class;

IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court's approval, as follows:

1. Smith, Laurent and Hussain are hereby appointed Co-Lead Plaintiffs in this Action and any subsequently filed or transferred actions that are consolidated with this Action, pursuant to 15 U.S.C. §78u-4(a)(3)(B); and

2. Co-Lead Plaintiffs' selections of Rosen Law and Pomerantz as Co-Lead Counsel and SWCC as Liaison Counsel for the Class are hereby approved.

IT IS SO STIPULATED.

DATED: January 25, 2022

STECKLER WAYNE COCHRAN
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*Additional Counsel for Movants Robert
Laurent and Ajmal Hussain*

IT IS SO ORDERED.

DATED: March 14, 2022



The Honorable Charles Eskridge
United States District Judge